

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PARTEC AG and BF EXAQC AG,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 2:24-cv-00433-RWS-RSP

JURY TRIAL DEMANDED

**DECLARATION OF BETTY CHEN IN SUPPORT OF
MICROSOFT'S MOTION FOR A STAY PENDING RESOLUTION OF
INSTITUTED *INTER PARTES* REVIEW OF U.S. PATENT NO. 11,537,442**

I, Betty Chen, declare and state as follows:

1. I am a partner at the law firm Desmarais LLP and lead counsel of record for Defendant Microsoft Corporation ("Microsoft"). I am admitted to and in good standing with the State Bar of Texas and the Bar of this Court. I submit this declaration in support of Microsoft's Motion For A Stay Pending Resolution Of Instituted *Inter Partes* Review Of U.S. Patent No. 11,537,442, filed contemporaneously. I have personal knowledge of the matters stated in this declaration and if called as a witness, I would truthfully testify to the same.

2. **Exhibit A** is a true and correct copy of the July 8, 2025 decision by the Patent Trial and Appeal Board instituting *Inter Partes* Review of U.S. Patent No. 11,537,442 (the '442 Patent).

3. **Exhibit B** is a true and correct copy of the June 12, 2025 decision by Acting Director of the U.S. Patent and Trademark Office Coke Morgan Stewart denying Patent Owner's Request for Discretionary Denial of the '442 Patent IPR.

4. **Exhibit C** is excerpted from a true and correct uncertified copy of the File History for U.S. Patent No. 11,537,442.

5. **Exhibit D** is excerpted from a true and correct uncertified copy of the File History for U.S. Patent No. 11,934,883.

6. **Exhibit E** is a true and correct copy of the cover document from Plaintiffs' September 4, 2024 Infringement Contentions.

7. **Exhibit F** is a true and correct copy of Microsoft's December 20, 2024 Petition for *Inter Partes* Review of U.S. Patent No. 11,537,442.

8. **Exhibit G** is a true and correct copy of Patent Owner's Request for Discretionary Denial of the '442 Patent IPR.

9. **Exhibit H** is a true and correct copy of Microsoft's August 8, 2025 letter to ParTec.

10. **Exhibit I** is a true and correct copy of ParTec's August 14, 2025 email response to Microsoft's August 8, 2025 letter.

11. **Exhibit J** is a true and correct copy of ParTec's June 16, 2025 First Supplemental Initial And Additional Disclosures.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 19, 2025.

By: /s/ Betty Chen
Betty Chen

*Lead Attorney For Defendant
Microsoft Corporation*